# CRIMINAL COMPLAINT FOR FEDERAL AND STATE LAW VIOLATIONS

### JUSTIN RIDDLE

Complainant and Victim of Corporate Criminal Enterprise Constitutional Rights Advocate and Anti-Corruption Specialist

**Date:** June 26th, 2025

TO: TEXAS RANGER DIVISION - MAJOR CRIMES UNIT

# COMPLAINANT INFORMATION

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# **DEFENDANT**

**DEFENDANT:** X CORP (Formerly Twitter, Inc.)

Corporate Address: 865 FM-1209, Bastrop, Texas

**Business Registration:** Delaware Corporation

Texas Operations: Conducting business within Texas jurisdiction through servers, users, and

commercial activities

# CRIMINAL VIOLATIONS ALLEGED

# FEDERAL CRIMES:

# 1. 18 U.S.C. § 2319 - Criminal Copyright Infringement

- Classification: Felony (up to 5 years imprisonment)
- Willful infringement for commercial advantage
- Retail value exceeding \$1,000 threshold

### 2. 18 U.S.C. § 1030 - Computer Fraud and Abuse Act

- Classification: Felony (up to 10 years imprisonment)
- Using computer systems to commit fraud
- Intentional access to protected computers for fraudulent purposes

### 3. 18 U.S.C. § 1341/1343 - Mail and Wire Fraud

- Classification: Felony (up to 20 years imprisonment)
- Scheme to defraud using interstate communications
- Systematic advertising fraud through false metrics

### 4. 18 U.S.C. § 1956 - Money Laundering

- Classification: Felony (up to 20 years imprisonment)
- Concealing proceeds from criminal copyright infringement
- Disguising illegal advertising revenue through corporate structures

# **TEXAS STATE CRIMES:**

# 1. Texas Penal Code § 31.03 - Theft

- Classification: State Jail Felony to First Degree Felony (value dependent)
- Unlawful appropriation of copyrighted material
- Commercial use without authorization

# 2. Texas Penal Code § 32.21 - Online Impersonation

- Classification: Third Degree Felony (2-10 years imprisonment)
- Using complainant's photographs to create false online identity
- Intent to harm, defraud, intimidate, or threaten

# 3. Texas Penal Code § 32.46 - Money Laundering

- Classification: State Jail Felony to First Degree Felony
- Concealing criminal proceeds from copyright infringement
- Using legitimate business operations to hide illegal revenue

# 4. Texas Penal Code § 32.45 - Credit Card or Debit Card Abuse

- Classification: State Jail Felony
- Fraudulent advertising metrics leading to false billing

# JURISDICTIONAL BASIS

# **Federal Jurisdiction:**

- Interstate commerce through internet-based platform
- Federal copyright law violations under Title 17 U.S.C.
- Wire communications crossing state boundaries
- Ongoing criminal conduct affecting multiple states

# **Texas State Jurisdiction:**

- Business operations conducted within Texas
- Texas users affected by criminal conduct
- Corporate presence through servers and data centers
- Commercial activities generating Texas revenue

• Active federal litigation pending in Western District of Texas (Case No. 1:25-CV-0073) documenting ongoing criminal conduct

# SUMMARY OF CRIMINAL ENTERPRISE

This complaint documents systematic criminal conduct by X Corp involving willful copyright infringement, advertising fraud, identity theft, and ongoing evidence destruction, all occurring under the protection of federal judicial inaction that has enabled continued criminal activity for 90+ days.

### **Core Criminal Elements:**

- Systematic Copyright Infringement Unauthorized commercial use of registered copyrighted photographs
- 2. **Identity Theft and Impersonation** Using complainant's photographs to create fraudulent online personas
- 3. **Advertising Fraud** Providing false metrics and billing for non-existent promotional services
- 4. **Evidence Destruction** Reactive platform modifications to conceal criminal conduct during active litigation
- Money Laundering Concealing proceeds from criminal activity through corporate revenue streams
- 6. **DMCA Violations** Willful refusal to comply with federal takedown requirements

# COUNT 1: CRIMINAL COPYRIGHT INFRINGEMENT

18 U.S.C. § 2319 and Texas Penal Code § 31.03

# The Criminal Act:

X Corp has systematically engaged in willful criminal copyright infringement by commercially exploiting complainant's registered copyrighted photographs without authorization, permission, or compensation while maintaining full knowledge of their criminal conduct.

# **Specific Criminal Conduct:**

### 1. Willful Infringement for Commercial Advantage:

- Used complainant's copyrighted photographs to create advertising revenue
- Charged third parties for promotional services using stolen intellectual property
- Maintained commercial exploitation despite explicit DMCA takedown notices
- Generated direct financial benefit from unauthorized usage

# 2. Knowledge and Intent:

- Received multiple DMCA takedown notices establishing actual knowledge
- Responded with accusations of "impersonation" proving they recognized unauthorized usage
- Continued exploitation after clear notification of copyright ownership
- Implemented technical modifications to hide rather than cease criminal conduct

# 3. Commercial Scale Operations:

- Retail value of infringed works exceeds \$1,000 statutory threshold
- Systematic exploitation across multiple user accounts and timeframes
- Integration into core business model and revenue generation systems
- Ongoing daily violations multiplying criminal exposure

# **Documentary Evidence:**

- Copyright Registration: Formal registration establishing legal ownership
- **DMCA Notices:** Multiple takedown requests proving actual knowledge
- **Platform Communications:** X Corp admissions of "impersonation" (acknowledging unauthorized usage)
- **Financial Records:** Billing statements proving commercial exploitation

• **Technical Evidence:** Screenshots and platform data showing continued unauthorized usage

### **Federal Criminal Statutes Violated:**

- 18 U.S.C. § 2319(b)(1) Willful copyright infringement for commercial advantage
- 17 U.S.C. § 512 DMCA safe harbor violations through non-compliance
- 18 U.S.C. § 2 Aiding and abetting ongoing criminal conduct

# **Texas Criminal Statutes Violated:**

- Texas Penal Code § 31.03 Theft of intellectual property
- Texas Penal Code § 31.03(e)(4)(A) Theft of property valued at \$1,500-\$20,000 (State Jail Felony)

# COUNT 2: ONLINE IMPERSONATION AND IDENTITY THEFT

### Texas Penal Code § 32.21 and Federal Identity Theft Statutes

# The Criminal Act:

X Corp has systematically used complainant's copyrighted photographs to create false online identities, enabling fraudulent advertising schemes and identity misrepresentation for commercial purposes.

# **Specific Criminal Conduct:**

### 1. False Identity Creation:

- Used complainant's photographs without authorization to create fake user profiles
- Enabled third parties to impersonate complainant for commercial advertising
- Created appearance that complainant endorsed products/services he never approved
- Facilitated identity theft through systematic photograph misappropriation

### 2. Commercial Exploitation of False Identity:

- Charged advertising fees for promotions using complainant's stolen identity
- Generated revenue from impersonation-based advertising schemes
- Provided false metrics attributing promotional success to unauthorized usage
- Maintained commercial impersonation systems despite clear ownership challenges

# 3. Intent to Harm and Defraud:

- Continued impersonation after explicit notification of unauthorized usage
- Used stolen identity to generate corporate revenue at complainant's expense
- Created false commercial associations without consent
- Enabled systematic fraud through identity misappropriation

# **Documentary Evidence:**

- Platform Screenshots: Unauthorized usage of complainant's photographs
- Advertising Records: Commercial exploitation of stolen identity
- DMCA Correspondence: X Corp acknowledgment of "impersonation" issues
- Financial Documentation: Revenue generation from identity theft
- **Technical Analysis:** Systematic integration of stolen photographs into advertising systems

# **Criminal Statutes Violated:**

- Texas Penal Code § 32.21(b)(1) Online impersonation with intent to harm/defraud
- Texas Penal Code § 32.21(c) Third degree felony classification
- 18 U.S.C. § 1028A Aggravated identity theft in connection with other felonies

# **COUNT 3: SYSTEMATIC ADVERTISING FRAUD**

18 U.S.C. § 1341/1343 and Texas Penal Code § 32.45

X Corp has operated a systematic advertising fraud scheme providing false metrics, impossible performance data, and fraudulent billing for promotional services while using stolen intellectual property as the foundation for their commercial deception.

# **Specific Criminal Conduct:**

### 1. False Metrics and Impossible Data:

- Provided mathematically impossible engagement statistics (over 100% engagement rates)
- Delivered promotional metrics that violated basic mathematical principles
- Charged premium fees for demonstrably fraudulent performance data
- Maintained billing systems based on false advertising effectiveness claims

### 2. Scheme to Defraud Through Interstate Communications:

- Used internet communications to transmit false advertising data across state lines
- Implemented systematic billing fraud through deceptive performance metrics
- Created appearance of legitimate advertising services while delivering fraud
- Maintained corporate revenue streams based on systematically false representations

### 3. Integration with Copyright Infringement:

- Used stolen copyrighted photographs as foundation for advertising fraud
- Combined identity theft with false metrics to create comprehensive fraud scheme
- Generated corporate revenue through multiple layered criminal violations
- Created systematic enterprise combining theft, fraud, and deception

# **Documentary Evidence:**

- Billing Statements: Charges for fraudulent advertising services
- **Performance Metrics:** Mathematically impossible engagement data
- Platform Analytics: Technical proof of false reporting systems
- Communication Records: Interstate transmission of fraudulent data

• **Financial Analysis:** Revenue generation through systematic deception

# **Criminal Statutes Violated:**

- 18 U.S.C. § 1343 Wire fraud through interstate communications
- 18 U.S.C. § 1341 Mail fraud through systematic scheme
- **Texas Penal Code § 32.45** Credit/Debit card abuse through false billing
- Texas Penal Code § 32.46 Fraudulent use of identifying information

# **COUNT 4: EVIDENCE DESTRUCTION AND OBSTRUCTION**

18 U.S.C. § 1519 and Texas Penal Code § 37.09

# The Criminal Act:

X Corp has systematically destroyed, concealed, and modified evidence of their criminal conduct in direct response to active federal litigation, demonstrating consciousness of guilt and deliberate obstruction of justice.

# **Specific Criminal Conduct:**

### 1. Reactive Evidence Modification:

- Implemented technical platform changes within hours of litigation filings
- Modified advertising metrics systems to conceal fraudulent data
- Altered user interface elements to hide evidence of systematic violations
- Coordinated evidence destruction during active federal court proceedings

### 2. Systematic Evidence Concealment:

- Removed access to historical performance data proving fraud
- Modified platform functionality to prevent evidence preservation
- Implemented technical barriers to documentation of ongoing violations

• Created systematic obstacles to discovery and evidence gathering

# 3. Obstruction During Active Litigation:

- Continued evidence destruction while federal emergency motions pending
- Escalated concealment efforts in direct response to court filings
- Demonstrated consciousness of guilt through reactive modifications
- Maintained obstruction despite clear federal court jurisdiction

# **Documentary Evidence:**

- Timeline Analysis: Correlation between court filings and platform modifications
- **Technical Documentation:** Screenshots proving systematic evidence alteration
- **Litigation Records:** Federal court filings documenting ongoing obstruction
- Comparative Analysis: Before/after evidence of systematic concealment
- Expert Analysis: Technical proof of coordinated evidence destruction

### **Criminal Statutes Violated:**

- 18 U.S.C. § 1519 Destruction of records in federal investigation
- 18 U.S.C. § 1503 Obstruction of justice during active proceedings
- **Texas Penal Code § 37.09** Tampering with evidence
- Texas Penal Code § 37.10 Tampering with governmental record

# COUNT 5: MONEY LAUNDERING AND FINANCIAL CRIMES

18 U.S.C. § 1956 and Texas Penal Code § 32.46

### The Criminal Act:

X Corp has systematically laundered proceeds from criminal copyright infringement, advertising fraud, and identity theft through legitimate corporate revenue streams, concealing the criminal origin of substantial financial gains.

# **Specific Criminal Conduct:**

### 1. Concealment of Criminal Proceeds:

- Integrated revenue from copyright infringement into corporate financial systems
- Disguised advertising fraud proceeds as legitimate business income
- Used corporate structures to conceal criminal profit sources
- Maintained financial systems designed to obscure illegal revenue generation

# 2. Financial Transaction Structuring:

- Processed criminal proceeds through multiple corporate entities
- Used complex financial structures to distance criminal activity from revenue
- Implemented billing systems that concealed theft-based profit generation
- Created appearance of legitimate business operations while committing systematic crimes

### 3. Interstate Financial Crime:

- Moved criminal proceeds across state boundaries through corporate banking
- Used interstate financial systems to launder theft-based revenue
- Maintained corporate accounts receiving proceeds from federal crimes
- Operated systematic money laundering through legitimate business appearance

# **Documentary Evidence:**

- Corporate Financial Records: Revenue streams from criminal activity
- Banking Analysis: Interstate movement of criminal proceeds
- Billing Documentation: Corporate systems processing theft-based revenue
- Financial Flow Analysis: Systematic laundering through corporate structures
- Revenue Attribution: Profits directly traceable to criminal copyright infringement

### **Criminal Statutes Violated:**

- 18 U.S.C. § 1956(a)(1) Money laundering through financial transactions
- 18 U.S.C. § 1956(a)(2) Transportation of criminal proceeds
- **Texas Penal Code § 32.46** Money laundering under state law
- 31 U.S.C. § 5324 Structuring transactions to avoid reporting requirements

# AGGRAVATING FACTORS AND PATTERN OF CRIMINAL ENTERPRISE

# **Systematic Criminal Enterprise:**

This criminal conduct represents coordinated enterprise spanning multiple federal and state crimes:

- 1. **Copyright Level:** Systematic theft of intellectual property for commercial exploitation
- 2. **Identity Level:** False persona creation through stolen photograph usage
- 3. Fraud Level: False advertising metrics and impossible performance data
- 4. Financial Level: Money laundering through corporate revenue systems
- 5. **Obstruction Level:** Evidence destruction during active federal litigation
- 6. **Pattern Evidence:** Coordinated criminal activity designed to maximize profit while minimizing accountability

# Federal Law Enforcement Failure Component:

- 90+ Days of Federal Court Inaction: Western District of Texas has failed to stop ongoing criminal conduct despite clear jurisdiction and emergency motions
- Judicial Protection of Criminal Activity: Federal judge systematic protection of ongoing crimes through deliberate inaction
- Enforcement Vacuum: Federal system failure creates necessity for state criminal enforcement

# **Constitutional Rights Violations:**

- Intellectual Property Rights: Systematic theft of federally protected copyrights
- Due Process Rights: Denial of legal remedies through federal court obstruction
- Equal Protection Rights: Different legal standards for corporate vs. individual defendants

# **Ongoing Criminal Activity:**

- **Daily Copyright Violations:** Each day of continued unauthorized usage = separate criminal count
- **Continuing Financial Crimes:** Revenue generation from ongoing theft
- Active Evidence Destruction: Systematic concealment during pending litigation
- Escalating Criminal Exposure: Multiplying violations with each day of continued activity

# FEDERAL COURT PROTECTION ENABLING CONTINUED CRIMES

# The Federal System Failure:

Western District of Texas Case No. 1:25-CV-0073 documents 90+ days of federal judicial protection for ongoing criminal conduct, creating necessity for state criminal enforcement when federal system fails.

# **Documented Federal Judicial Misconduct:**

- Emergency Motion Abandonment: 90+ days ignoring clear federal law violations
- Corporate Protection Scheme: Systematic judicial protection of obvious criminal conduct
- Procedural Weaponization: Using administrative delays to enable continued criminal activity
- Law Enforcement Suspension: Federal court refusal to enforce basic federal copyright law

# State Criminal Enforcement Necessity:

Federal system failure to enforce federal law creates constitutional crisis requiring state intervention under Texas criminal statutes to protect citizens when federal courts abandon law enforcement duties.

# The Escalating Criminal Pattern:

Every day of federal court inaction enables:

- Additional copyright infringement violations
- Continued evidence destruction and concealment
- Escalating financial crimes through ongoing money laundering
- Systematic obstruction of justice during active proceedings

# VICTIM IMPACT AND ONGOING HARM

# **Financial Harm:**

- Lost Revenue: Unauthorized commercial exploitation of copyrighted works
- Advertising Fraud Losses: Payment for fraudulent promotional services
- Legal Costs: Forced litigation due to corporate criminal conduct
- Business Interruption: Criminal activity disrupting legitimate business operations

### **Constitutional Harm:**

- Intellectual Property Theft: Systematic violation of federally protected rights
- Identity Misappropriation: Criminal use of personal identity for corporate profit
- Due Process Denial: Federal court system abandonment of law enforcement duties
- Equal Protection Violations: Different legal standards based on corporate status

# **Ongoing Criminal Exposure:**

- **Daily Multiplying Violations:** Each day of continued criminal conduct = additional criminal counts
- **Escalating Evidence Destruction:** Systematic concealment creating additional criminal liability
- **Federal System Failure:** Ongoing judicial protection enabling continued criminal enterprise

# **Personal Security Implications:**

- **Escalating Corporate Desperation:** Criminal exposure creating incentive for extralegal solutions
- Federal Protection Failure: Judicial system abandonment creating personal security risks
- Institutional Retaliation Potential: Corporate defendants with substantial resources facing criminal exposure

# EVIDENCE PRESERVATION AND INVESTIGATION REQUIREMENTS

# Comprehensive Evidence Available:

Complainant possesses extensive documentation including:

- Federal Court Records: Complete litigation file documenting ongoing criminal conduct
- Copyright Documentation: Formal registration and ownership proof
- DMCA Communications: Corporate admissions and knowledge evidence
- Financial Records: Billing and payment documentation proving fraud
- **Technical Evidence:** Platform screenshots and systematic documentation
- **Timeline Analysis:** Correlation between litigation and evidence destruction

# **Investigation Urgency:**

**Time-Critical Evidence Preservation:** X Corp possesses sophisticated technical capabilities enabling rapid evidence destruction, database modification, and systematic concealment within days or hours.

### Corporate Evidence Destruction Capabilities:

- World-class technical infrastructure enabling immediate systematic modifications
- Database administration teams capable of comprehensive evidence elimination
- Algorithmic manipulation systems for real-time platform changes
- Legal and technical teams coordinating evidence concealment strategies

# Federal System Failure Documentation:

**Perfect Record of Federal Judicial Misconduct:** Western District of Texas case provides comprehensive documentation that federal system has abandoned law enforcement, creating necessity for state criminal intervention.

# WITNESS LIST FOR CRIMINAL INVESTIGATION

# Corporate Personnel with Knowledge:

- X Corp Legal Department: Direct knowledge of DMCA violations and continued infringement
- **X Corp Technical Teams:** Platform modifications and evidence destruction coordination
- X Corp Financial Personnel: Revenue processing from criminal activity and money laundering
- X Corp Advertising Department: False metrics generation and systematic fraud implementation

# Federal Personnel Documenting System Failure:

• Judge Alan Albright: Federal judge systematically protecting ongoing criminal conduct

- Federal Court Personnel: Administrative staff documenting deliberate inaction on emergency motions
- U.S. Attorney's Office: Federal prosecutors who have been provided evidence but failed to act

# Technical and Financial Expert Witnesses:

- Copyright Experts: Testimony regarding federal intellectual property law violations
- Digital Forensics Experts: Technical analysis of evidence destruction and systematic concealment
- Financial Crimes Experts: Money laundering analysis and criminal proceeds tracking
- Advertising Industry Experts: Testimony regarding systematic fraud and impossible metrics

# CONSTITUTIONAL AND LEGAL URGENCY

# Federal System Failure Requires State Intervention:

When federal courts systematically abandon federal law enforcement to protect corporate criminal conduct, state criminal enforcement becomes constitutionally necessary to preserve rule of law and protect citizen rights.

# **Time-Critical Criminal Enforcement:**

- **Daily Multiplying Violations:** Each day of delay = additional criminal counts
- Ongoing Evidence Destruction: Corporate capabilities enabling systematic concealment
- **Escalating Financial Crimes:** Continued money laundering through ongoing criminal activity
- Federal Judicial Protection: Systematic enabling of criminal conduct through judicial inaction

# Constitutional Crisis Documentation:

This case documents complete federal system failure where:

- Federal courts protect ongoing federal crimes
- Corporate defendants operate with judicial immunity
- Citizens cannot obtain federal law enforcement through federal courts
- State criminal enforcement becomes necessary to preserve constitutional rights

# PRAYER FOR RELIEF AND IMMEDIATE ACTION

# Immediate Investigation and Arrest:

Complainant respectfully requests immediate Texas Ranger investigation leading to:

- 1. Criminal Charges: Filing comprehensive state and federal criminal charges against X Corp
- 2. **Asset Seizure:** Freezing corporate assets representing proceeds from criminal activity
- 3. **Evidence Preservation:** Immediate court orders preventing further evidence destruction
- 4. Financial Investigation: Comprehensive audit of revenue streams from criminal conduct
- 5. **Interstate Coordination:** Coordination with federal authorities regarding systematic judicial misconduct
- 6. Victim Protection: Security measures addressing escalating personal safety risks

# Systematic Accountability:

- 1. Corporate Criminal Prosecution: Full criminal charges under state and federal law
- 2. **Financial Restitution:** Recovery of all proceeds from criminal activity
- 3. **Institutional Reform:** Investigation of federal court protection enabling criminal conduct
- 4. **Public Safety Protection:** Preventing continued criminal activity through corporate prosecution

# **Federal System Reform:**

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- 1. **Judicial Misconduct Investigation:** Texas Rangers investigation of federal court protection of criminal activity
- 2. **Interstate Criminal Enforcement:** State prosecution when federal system fails
- 3. Constitutional Rights Protection: Enforcement of federal rights through state criminal law
- 4. Rule of Law Restoration: Demonstration that criminal conduct will be prosecuted regardless of federal court protection

# **CONCLUSION**

X Corp has systematically engaged in criminal copyright infringement, identity theft, advertising fraud, money laundering, and evidence destruction while operating under the protection of federal judicial misconduct that has suspended law enforcement for 90+ days.

This represents a comprehensive criminal enterprise combining theft of intellectual property, systematic fraud, and obstruction of justice, all enabled by federal court abandonment of basic law enforcement duties.

Every element of multiple federal and state crimes is provable through documentary evidence.

The criminal conduct continues daily, creating multiplying violations and escalating criminal exposure with each day of delay in prosecution.

Federal system failure makes state criminal enforcement constitutionally necessary.

When federal courts systematically protect criminal conduct, state law enforcement must intervene to preserve rule of law and constitutional rights.

The evidence demands immediate criminal prosecution and comprehensive investigation of the systematic criminal enterprise X Corp has operated with impunity under federal judicial protection.

The citizens of Texas and the integrity of state criminal enforcement require immediate action against this documented criminal enterprise.

Respectfully submitted,

# JUSTIN RIDDLE

Pro Se Complainant
Victim of Systematic Corporate Criminal Enterprise
Constitutional Rights Advocate
Pattern Recognition Expert in Institutional Corruption
402-813-2156

# CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Criminal Complaint has been prepared for submission to the Texas Ranger Division Major Crimes Unit, and that copies will be provided to relevant federal oversight organizations monitoring systematic judicial misconduct and corporate criminal activity.

# JUSTIN RIDDLE

Complainant, Pro Se